

Exhibit A

From: Andrews, Christopher
Sent: Friday, July 31, 2020 8:05 PM
To: Rich Gluck; Koch, Bryan; Keil Mueller
Cc: Michael Blatchley; Keith Dubanevich; Tim DeJong; Michael Mathai; Lydia Anderson-Dana; Fishbein, Gregg M.; Gibbs, Patrick; Lightdale, Sarah; Munley, Caitlin B; Blair, Ryan; wmcnab@winthrop.com; tcooke@winthrop.com; z/CTLSecMN; Martin, Christopher L.; Boyd, Tom
Subject: RE: In re CenturyLink Sales Practices & Sec. Litig., No. 18-cv-296 (MJD/KMM)

Rich,

Thank you for your email. As you know, we are under no obligation to supply Plaintiffs' positions to the Court on their behalf, and Plaintiffs are free to communicate with the Court if and as they believe appropriate. But in the spirit of cooperation, and in the interest of reducing the volume of correspondence before the Court, Defendants will attach this complete email exchange to their letter request for leave to file a reply brief.

Best,
Chris

Christopher M. Andrews

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From: Rich Gluck <Rich.Gluck@blbglaw.com>
Sent: Thursday, July 30, 2020 12:06 PM
To: Andrews, Christopher <candrews@cooley.com>; Koch, Bryan <bkoch@cooley.com>; Keil Mueller <KM Mueller@stollberne.com>
Cc: Michael Blatchley <MichaelB@blbglaw.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; Michael Mathai <Michael.Mathai@blbglaw.com>; Lydia Anderson-Dana <landersondana@stollberne.com>; Fishbein, Gregg M. <gmfishbein@locklaw.com>; Gibbs, Patrick <pgibbs@cooley.com>; Lightdale, Sarah <slightdale@cooley.com>; Munley, Caitlin B <cmunley@cooley.com>; Blair, Ryan <rblair@cooley.com>; wmcnab@winthrop.com; tcooke@winthrop.com; z/CTLSecMN <zCTLSecMN@cooley.com>; Martin, Christopher L. <cmartin@cooley.com>
Subject: RE: In re CenturyLink Sales Practices & Sec. Litig., No. 18-cv-296 (MJD/KMM)

[External]

Chris,

Contrary to your assertions, we explained in detail during our extensive meet and confer on July 14 the specific claims and allegations to which the discovery sought is relevant. We also described the customer complaints and Great Place to Work

documents that demonstrated the relevance of the documents Plaintiffs seek. That we did not specify each of the paragraphs in the complaint or provide specific Bates numbers for those documents in no way deprived Defendants of an opportunity to address Plaintiffs' relevance arguments in Defendants' motion. Your suggestion to the contrary is simply a pretext for seeking to flout the Local Rules' prohibition against reply briefs. After all, had you truly believed that the precise paragraph numbers and Bates numbers were important, you simply could have asked us for that information. That you didn't suggests that Defendants' request to file a reply is an improper attempt to manufacture arguments about scope and undue burden that should have been made in their initial motion.

But as we noted in our meet and confers and in our response, the proper avenue to address those arguments is through the normal meet and confer process that Plaintiffs should be having with the third parties, without Defendants' interference. In this regard, your request for another seven days to file an additional brief prejudices Plaintiffs, as it necessarily delays Plaintiffs from engaging in meaningful meet and confers with the third parties and obtaining the evidence sought by the subpoenas, which originally had a return date of June 26, 2020. As such, we oppose Defendants' request for leave to file a reply.

Please include this response in any request you may make to file another brief with the Court.

Kind regards,

Rich

From: Andrews, Christopher <candrews@cooley.com>

Sent: Wednesday, July 29, 2020 2:24 PM

To: Koch, Bryan <bkoch@cooley.com>; Rich Gluck <Rich.Gluck@blbglaw.com>; Keil Mueller <KM Mueller@stollberne.com>

Cc: Michael Blatchley <MichaelB@blbglaw.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; Michael Mathai <Michael.Mathai@blbglaw.com>; Lydia Anderson-Dana <landersondana@stollberne.com>; Fishbein, Gregg M. <gmmfishbein@locklaw.com>; Gibbs, Patrick <pgibbs@cooley.com>; Lightdale, Sarah <slightdale@cooley.com>; Munley, Caitlin B <cmunley@cooley.com>; Blair, Ryan <rblair@cooley.com>; wmcnab@winthrop.com; tcooke@winthrop.com; z/CTLSecMN <zCTLSecMN@cooley.com>; Martin, Christopher L. <cmartin@cooley.com>

Subject: RE: In re CenturyLink Sales Practices & Sec. Litig., No. 18-cv-296 (MJD/KMM)

[External]

Rich, Keil,

In Plaintiffs' response to Defendants' protective order motion, Plaintiffs have cited to documents from CenturyLink's productions and allegations in specific paragraphs of the Complaint. But during our two meet and confers, Plaintiffs did not describe or otherwise identify these documents such that Defendants could have responded to them. Likewise, Plaintiffs made only vague allusions, without identifying any paragraphs of the Complaint, to the allegations discussed repeatedly and at length in Plaintiffs' response. The meet and confer process, therefore, did not afford Defendants an opportunity to address Plaintiffs' position regarding these documents and specific allegations in the Complaint.

Accordingly, Defendants intend to request leave to file a reply brief to address these documents and allegations. Please let us know if you are willing to stipulate to Defendants filing a 1,500 word reply within 7 days of Plaintiffs' agreement to this proposal, or to take no position on Defendants' request for leave. (This word limit is approximately 2,100 fewer words than in Plaintiffs' response, and the time period to file is exactly the same as that afforded for Plaintiffs' response.).

Please let us know if Plaintiffs are willing to stipulate to this proposal by Thursday at 3 pm ET.

Best,

Chris

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From: Koch, Bryan <bkoch@cooley.com>

Sent: Thursday, July 16, 2020 2:28 PM

To: Rich Gluck <Rich.Gluck@blbglaw.com>; Keil Mueller <KM Mueller@stollberne.com>

Cc: Michael Blatchley <michaelb@blbglaw.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; Michael Mathai <michael.mathai@blbglaw.com>; Lydia Anderson-Dana <landersondana@stollberne.com>; Fishbein, Gregg M. <gmfishbein@locklaw.com>; Gibbs, Patrick <pgibbs@cooley.com>; Lightdale, Sarah <slightdale@cooley.com>; Munley, Caitlin B <cmunley@cooley.com>; Blair, Ryan <rblair@cooley.com>; wmcnab@winthrop.com; tcooke@winthrop.com; z/CTLSecMN <zCTLSecMN@cooley.com>; Martin, Christopher L. <cmartin@cooley.com>; Andrews, Christopher <candrews@cooley.com>

Subject: RE: In re CenturyLink Sales Practices & Sec. Litig., No. 18-cv-296 (MJD/KMM)

Rich, Keil,

Thank you for reaching out yesterday. Our position remains that these eleven subpoenas seek information well beyond what is relevant and/or proportional under the Federal Rules. Your offer to withdraw only one of the eleven subpoenas, while proceeding with the other ten, does not address those concerns. We understand the parties to be at impasse and will file Defendants' motion for a protective order today, with a hearing date "TBD."

Best,
Bryan

Bryan Koch

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From: Koch, Bryan

Sent: Wednesday, July 15, 2020 12:35 PM

To: 'Keil Mueller' <KM Mueller@stollberne.com>; Andrews, Christopher <candrews@cooley.com>; Michael Blatchley <michaelb@blbglaw.com>

Cc: Michael Blatchley <michaelb@blbglaw.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; Michael Mathai <michael.mathai@blbglaw.com>; Lydia Anderson-Dana <landersondana@stollberne.com>; Fishbein, Gregg M. <gmfishbein@locklaw.com>; Gibbs, Patrick <pgibbs@cooley.com>; Lightdale, Sarah <slightdale@cooley.com>; Munley, Caitlin B <cmunley@cooley.com>; Blair, Ryan <rblair@cooley.com>; wmcnab@winthrop.com; tcooke@winthrop.com; z/CTLSecMN <zCTLSecMN@cooley.com>;

Martin, Christopher L. <cmartin@cooley.com>

Subject: RE: In re CenturyLink Sales Practices & Sec. Litig., No. 18-cv-296 (MJD/KMM)

Keil,

Thanks for your time during yesterday's call, during which the parties established that they are at an impasse regarding Plaintiffs' eleven third-party subpoenas. I am writing to confirm that tomorrow Defendants will be filing a motion for a protective order before Judge Menendez regarding those subpoenas. We have made the Court aware of our intention to file a motion, and we received permission to file with a hearing date "TBD."

Best,
Bryan

Bryan Koch

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From: Keil Mueller <KM Mueller@stollberne.com>

Sent: Thursday, July 9, 2020 10:40 PM

To: Andrews, Christopher <candrews@cooley.com>; Michael Blatchley <michaelb@blbglaw.com>

Cc: Michael Blatchley <michaelb@blbglaw.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; Michael Mathai <michael.mathai@blbglaw.com>; Lydia Anderson-Dana <landersondana@stollberne.com>; Fishbein, Gregg M. <gmfishbein@locklaw.com>; Gibbs, Patrick <pgibbs@cooley.com>; Lightdale, Sarah <slightdale@cooley.com>; Munley, Caitlin B <cmunley@cooley.com>; Blair, Ryan <rblair@cooley.com>; wmcnab@winthrop.com; tcooke@winthrop.com; z/CTLSecMN <zCTLSecMN@cooley.com>; Martin, Christopher L. <cmartin@cooley.com>; Koch, Bryan <bkoch@cooley.com>

Subject: RE: In re CenturyLink Sales Practices & Sec. Litig., No. 18-cv-296 (MJD/KMM)

[External]

Chris,

We are available next Tuesday at 3:30 pm ET. Please circulate a dial in number at your convenience.

We look forward to speaking with you.

Kind regards,
Keil

Keil Mueller
kmueller@stollberne.com
direct: (503) 972-7157
pronouns: he/him/his

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From: Andrews, Christopher <candrews@cooley.com>

Sent: Thursday, July 9, 2020 1:44 PM

To: Keil Mueller <KM Mueller@stollberne.com>; Michael Blatchley <michaelb@blbglaw.com>

Cc: Michael Blatchley <michaelb@blbglaw.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; Michael Mathai <michael.mathai@blbglaw.com>; Lydia Anderson-Dana <landersondana@stollberne.com>; Fishbein, Gregg M. <gmmfishbein@locklaw.com>; pgibbs@cooley.com; slightdale@cooley.com; Munley, Caitlin B <cmunley@cooley.com>; Blair, Ryan <rblair@cooley.com>; wmcnab@winthrop.com; tcooke@winthrop.com; z/CTLSecMN <zCTLSecMN@cooley.com>; Martin, Christopher L. <cmartin@cooley.com>; Koch, Bryan <bkoch@cooley.com>

Subject: RE: In re CenturyLink Sales Practices & Sec. Litig., No. 18-cv-296 (MJD/KMM)

Keil,

Thank you very much for your response. CenturyLink agrees to Plaintiffs' proposal to extend the deadline to July 17, 2020. We are available to meet and confer on Tuesday, July 14 at 3:30 PM ET. Please let us know if Plaintiffs are free then.

We would note that Plaintiffs (once again) could have communicated much earlier their unavailability to meet and confer this week ahead of the July 10 return date—not several days after Defendants first offered to meet and confer. Plaintiffs also could have done so without prompting from Defendants. In any event, we look forward to meeting and conferring next week.

Best,
Chris

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From: Keil Mueller <KM Mueller@stollberne.com>

Sent: Thursday, July 9, 2020 1:50 PM

To: Andrews, Christopher <candrews@cooley.com>; Michael Blatchley <michaelb@blbglaw.com>

Cc: Michael Blatchley <michaelb@blbglaw.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; Michael Mathai <michael.mathai@blbglaw.com>; Lydia Anderson-Dana <landersondana@stollberne.com>; Fishbein, Gregg M. <gmmfishbein@locklaw.com>; Gibbs, Patrick <pgibbs@cooley.com>; Lightdale, Sarah <slightdale@cooley.com>; Munley, Caitlin B <cmunley@cooley.com>; Blair, Ryan <rblair@cooley.com>; wmcnab@winthrop.com; tcooke@winthrop.com; z/CTLSecMN <zCTLSecMN@cooley.com>; Martin, Christopher L. <cmartin@cooley.com>; Koch, Bryan <bkoch@cooley.com>

Subject: RE: In re CenturyLink Sales Practices & Sec. Litig., No. 18-cv-296 (MJD/KMM)

[External]

Chris,

We are willing to meet and confer concerning the debt collector and Great Place to Work subpoenas, but are not available until early next week. In connection with that anticipated meet and confer, we are willing to extend the response date for the subpoenas until July 17, 2020.

If this works for Defendants, please let us know your availability Monday through Wednesday next week.

Regards,
Keil

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From: Andrews, Christopher <candrews@cooley.com>

Sent: Thursday, July 9, 2020 9:45 AM

To: Keil Mueller <KMueller@stollberne.com>; Michael Blatchley <michaelb@blbglaw.com>

Cc: Michael Blatchley <michaelb@blbglaw.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; Michael Mathai <michael.mathai@blbglaw.com>; Lydia Anderson-Dana <landersondana@stollberne.com>; Fishbein, Gregg M. <gmmfishbein@locklaw.com>; pgibbs@cooley.com; slightdale@cooley.com; Munley, Caitlin B <cmunley@cooley.com>; Blair, Ryan <rblair@cooley.com>; wmcnab@winthrop.com; tcooke@winthrop.com; z/CTLSecMN <zCTLSecMN@cooley.com>; Martin, Christopher L. <cmartin@cooley.com>; Koch, Bryan <bkoch@cooley.com>

Subject: RE: In re CenturyLink Sales Practices & Sec. Litig., No. 18-cv-296 (MJD/KMM)

Keil, Mike,

We are writing to follow up on our July 6, 2020 letter regarding Plaintiffs' third-party subpoenas to the debt collectors and Great Place to Work Institute, Inc. We first communicated our objections to these subpoenas during the parties' June 23 meet and confer. We understood that the parties agreed to extend the return date for these subpoenas from June 26 to July 10 to grant the parties more time to discuss.

To that end, we sent the July 6 letter, outlining our objections and inviting Plaintiffs to meet and confer on July 8. We have not received a response. Please confirm by 5:30 pm today that the parties are at impasse or that Plaintiffs intend to meet and confer regarding these subpoenas prior to the July 10 return date.

Otherwise, given Plaintiffs' failure to respond, we have no choice but to conclude that the parties are at impasse. We therefore will have to consider exercising our rights to object to this discovery, including by filing a motion for a protective order.

Best,

Chris

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From: Andrews, Christopher <candrews@cooley.com>

Sent: Monday, July 6, 2020 9:26 PM

To: Keil Mueller <KMuedler@stollberne.com>; Michael Blatchley <michaelb@blbglaw.com>

Cc: Michael Blatchley <michaelb@blbglaw.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; Michael Mathai <michael.mathai@blbglaw.com>; Lydia Anderson-Dana <landersondana@stollberne.com>; Fishbein, Gregg M. <gmfishbein@locklaw.com>; Gibbs, Patrick <pgibbs@cooley.com>; Lightdale, Sarah <slightdale@cooley.com>; Munley, Caitlin B <cmunley@cooley.com>; Blair, Ryan <rblair@cooley.com>; wmcnab@winthrop.com; tcooke@winthrop.com; z/CTLSecMN <zCTLSecMN@cooley.com>; Martin, Christopher L. <cmartin@cooley.com>; Koch, Bryan <bkoch@cooley.com>

Subject: RE: In re CenturyLink Sales Practices & Sec. Litig., No. 18-cv-296 (MJD/KMM)

Keil, Mike,

Please see the attached letter.

Best,
Chris

Christopher M. Andrews

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From: Koch, Bryan <bkoch@cooley.com>

Sent: Wednesday, June 24, 2020 12:32 AM

To: Keil Mueller <KMuedler@stollberne.com>; Michael Blatchley <michaelb@blbglaw.com>

Cc: Michael Blatchley <michaelb@blbglaw.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; Michael Mathai <michael.mathai@blbglaw.com>; Lydia Anderson-Dana <landersondana@stollberne.com>; Fishbein, Gregg M. <gmfishbein@locklaw.com>; Gibbs, Patrick <pgibbs@cooley.com>; Lightdale, Sarah <slightdale@cooley.com>; Munley, Caitlin B <cmunley@cooley.com>; Blair, Ryan <rblair@cooley.com>; wmcnab@winthrop.com; tcooke@winthrop.com; z/CTLSecMN <zCTLSecMN@cooley.com>;

Martin, Christopher L. <cmartin@cooley.com>

Subject: RE: In re CenturyLink Sales Practices & Sec. Litig., No. 18-cv-296 (MJD/KMM)

Keil,

Thanks for your response. CenturyLink agrees to Plaintiffs' proposal to extend the deadline to July 10, 2020. We will be in touch in the coming days to further discuss.

Bryan

Bryan Koch

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From: Keil Mueller <KM Mueller@stollberne.com>

Sent: Tuesday, June 23, 2020 10:25 PM

To: Koch, Bryan <bkoch@cooley.com>; Michael Blatchley <michaelb@blbglaw.com>

Cc: Michael Blatchley <michaelb@blbglaw.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; Michael Mathai <michael.mathai@blbglaw.com>; Lydia Anderson-Dana <landersondana@stollberne.com>; Fishbein, Gregg M. <gmmfishbein@locklaw.com>; Gibbs, Patrick <pgibbs@cooley.com>; Lightdale, Sarah <slightdale@cooley.com>; Munley, Caitlin B <cmunley@cooley.com>; Blair, Ryan <rblair@cooley.com>; wmcnab@winthrop.com; tcooke@winthrop.com; z/CTLSecMN <zCTLSecMN@cooley.com>; Martin, Christopher L. <cmartin@cooley.com>

Subject: RE: In re CenturyLink Sales Practices & Sec. Litig., No. 18-cv-296 (MJD/KMM)

[External]

Bryan,

Thank you for your time on the call today, as well, and thank you for your email. We do not intend to raise any other substantive issues during the conference Thursday with Judge Menendez. We do, however, intend to request that the Court set a future date for an informal conference on the parties' dispute over the sufficiency of Defendants' responses to interrogatories 6 and 7.

As for the third-party subpoenas on the collection agencies and A Great Place to Work, we disagree that the materials the subpoenas seek are irrelevant. The complaint specifically alleges that CenturyLink concealed from investors its long-standing practice of cramming customers by charging them fees to which they never agreed and for services they never requested or ordered. Defendants have denied that CenturyLink engaged in such practices. Whether CenturyLink engaged in cramming is thus directly at issue in this case. The subpoenas seek evidence to show that CenturyLink did engage in cramming and the extent of that cramming. The recipients of the subpoenas are collection agencies with whom CenturyLink contracted to collect from CenturyLink customers moneys owed on outstanding bills. The subpoenas specifically seek documents concerning CenturyLink's sales and billing practices and cramming. If those collection agencies have documents reflecting customer complaints about CenturyLink's improper sales and billing practices, they are relevant and discoverable.

The materials sought from A Great Place to Work likewise are relevant to our claims. For example, among

other things, our understanding is that A Great Place to Work was involved in conducting employee surveys and providing feedback to senior managers concerning cramming and other unethical behavior by CenturyLink employees, and management's knowledge of those practices.

Nonetheless, we are willing to extend the deadline for Defendants to move for a protective order to allow the parties more time to discuss the issues. Three weeks is excessive, however, especially since Defendants chose to wait almost two weeks before raising the issue. We will agree to extend the deadline by two weeks, until July 10, 2020.

Regards,
Keil

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From: Koch, Bryan <bkoch@cooley.com>
Sent: Tuesday, June 23, 2020 4:05 PM
To: Keil Mueller <KMueller@stollberne.com>; Michael Blatchley <michaelb@blbglaw.com>
Cc: Michael Blatchley <michaelb@blbglaw.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; Michael Mathai <michael.mathai@blbglaw.com>; Lydia Anderson-Dana <landersondana@stollberne.com>; Fishbein, Gregg M. <gmmfishbein@locklaw.com>; pgibbs@cooley.com; slightdale@cooley.com; Munley, Caitlin B <cmunley@cooley.com>; Blair, Ryan <rblair@cooley.com>; wmcnab@winthrop.com; tcooke@winthrop.com; z/CTLSecMN <zCTLSecMN@cooley.com>; Martin, Christopher L. <cmartin@cooley.com>
Subject: RE: In re CenturyLink Sales Practices & Sec. Litig., No. 18-cv-296 (MJD/KMM)

Keil, Mike,

Thanks for your time during today's call. As we discussed, we ask that Plaintiffs clarify today whether there are any topics they intend to raise in connection with Thursday's hearing before Judge Menendez, beyond what we already agreed is ripe for the hearing during our call.

In addition, we discussed the eleven non-party subpoenas Plaintiffs issued on June 11, 2020, with return dates of June 26, 2020. As we explained, we think the materials sought in those subpoenas are neither relevant nor proportional to the needs of the case, not least of which because these third-parties' interactions with CenturyLink customers are exceedingly remote from the allegations Plaintiffs have advanced in this case. CenturyLink is entitled to move for a protective order on these grounds. *See Shukh v. Seagate Tech, LLC*, 295 F.R.D. 228, 236 (D. Minn. 2013).

We suggested that Plaintiffs agree to informally extend the return dates on these eleven subpoenas. This would afford the parties an opportunity to more comprehensively meet and confer as to their scope, consistent with the Court's expectations. Please let us know no later than 12PM Eastern tomorrow whether Plaintiffs are willing to extend these return dates by three weeks to July 17, 2020.

Thanks,
Bryan

Bryan Koch

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From: Keil Mueller <KM Mueller@stollberne.com>
Sent: Tuesday, June 23, 2020 4:00 PM
To: Martin, Christopher L. <cmartin@cooley.com>; Blair, Ryan <rblair@cooley.com>
Cc: Michael Blatchley <michaelb@blbglaw.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; Michael Mathai <michael.mathai@blbglaw.com>; Lydia Anderson-Dana <landersondana@stollberne.com>; Fishbein, Gregg M. <gmmfishbein@locklaw.com>; Gibbs, Patrick <pgibbs@cooley.com>; Lightdale, Sarah <slightdale@cooley.com>; Koch, Bryan <bkoch@cooley.com>; Munley, Caitlin B <cmunley@cooley.com>; wmcnab@winthrop.com; tcooke@winthrop.com; z/CTLSecMN <zCTLSecMN@cooley.com>
Subject: RE: In re CenturyLink Sales Practices & Sec. Litig., No. 18-cv-296 (MJD/KMM)

[External]

Chris:

Thank you for sending this. Your list looks complete.

Keil

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pronouns: he/him/his

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From: Martin, Christopher L. <cmartin@cooley.com>
Sent: Tuesday, June 23, 2020 10:37 AM
To: Keil Mueller <KM Mueller@stollberne.com>; Blair, Ryan <rblair@cooley.com>
Cc: Michael Blatchley <michaelb@blbglaw.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; Michael Mathai <michael.mathai@blbglaw.com>; Lydia Anderson-Dana <landersondana@stollberne.com>; Fishbein, Gregg M. <gmmfishbein@locklaw.com>; pgibbs@cooley.com; slightdale@cooley.com; Koch, Bryan <bkoch@cooley.com>; Munley, Caitlin B <cmunley@cooley.com>; wmcnab@winthrop.com; tcooke@winthrop.com; z/CTLSecMN <zCTLSecMN@cooley.com>
Subject: RE: In re CenturyLink Sales Practices & Sec. Litig., No. 18-cv-296 (MJD/KMM)

Mike and Keil:

We anticipate discussing the following issues during today's meet and confer at 4 PM ET:

- Your June 10 letter regarding Interrogatory Nos. 2, 5, 6, and 7, and search terms for the Integrity Line custodian
- Your June 11 letter regarding Plaintiffs' non-party subpoena to Qualfon Corp.
- Disputes to be raised during Thursday's informal discovery conference before Judge Menendez
- Plaintiffs' non-party subpoenas identified in June 11 notice

Please let us know if there are any other issues that you would like to discuss.

Regards,

Chris

Christopher L. Martin, Jr.

Cooley LLP
+1 212 479 6484 office
+1 917 318 4624 mobile

From: Keil Mueller <KM Mueller@stollberne.com>

Sent: Tuesday, June 16, 2020 5:38 PM

To: Martin, Christopher L. <cmartin@cooley.com>; Blair, Ryan <rblair@cooley.com>

Cc: Michael Blatchley <michaelb@blbglaw.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; Michael Mathai <michael.mathai@blbglaw.com>; Lydia Anderson-Dana <landersondana@stollberne.com>; Fishbein, Gregg M. <gmmfishbein@locklaw.com>; Gibbs, Patrick <pgibbs@cooley.com>; Lightdale, Sarah <slightdale@cooley.com>; Koch, Bryan <bkoch@cooley.com>; Munley, Caitlin B <cmunley@cooley.com>; wmcnab@winthrop.com; tcooke@winthrop.com; z/CTLSecMN <zCTLSecMN@cooley.com>

Subject: RE: In re CenturyLink Sales Practices & Sec. Litig., No. 18-cv-296 (MJD/KMM)

[External]

Chris:

We are available on Tuesday, June 23, at 4:00 pm ET. We will circulate call-in information.

Best,
Keil

Keil M. Mueller
keil@stollberne.com
direct: (503) 972-7157
pronouns: he/him/his

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From: Martin, Christopher L. <cmartin@cooley.com>

Sent: Monday, June 15, 2020 4:19 PM

To: Keil Mueller <KM Mueller@stollberne.com>; Blair, Ryan <rblair@cooley.com>

Cc: Michael Blatchley <michaelb@blbglaw.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; Michael Mathai <michael.mathai@blbglaw.com>; Lydia Anderson-Dana <landersondana@stollberne.com>; Fishbein, Gregg M. <gmfishbein@locklaw.com>; pgibbs@cooley.com; slightdale@cooley.com; Koch, Bryan <bkoch@cooley.com>; Munley, Caitlin B <cmunley@cooley.com>; wmcnab@winthrop.com; tcooke@winthrop.com; z/CTLSecMN <zCTLSecMN@cooley.com>
Subject: RE: In re CenturyLink Sales Practices & Sec. Litig., No. 18-cv-296 (MJD/KMM)

Mike and Keil:

We are in receipt of your June 10 letter regarding CenturyLink's Amended and Supplemented Responses and Objections to Plaintiffs' First and Second Set of Interrogatories and your June 11 letter regarding Plaintiffs' September 2019 subpoena to non-party Qualfon Corporation. We are available to meet and confer on the topics raised in both letters on Tuesday, June 23 after 4:00 PM ET. Please let us know if you are free that afternoon.

Regards,

Chris

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From: Keil Mueller <KM Mueller@stollberne.com>

Sent: Thursday, June 11, 2020 7:26 PM

To: Blair, Ryan <rblair@cooley.com>

Cc: Michael Blatchley <michaelb@blbglaw.com>; Keith Dubanevich <KDubanevich@stollberne.com>; Tim DeJong <TDeJong@stollberne.com>; Michael Mathai <michael.mathai@blbglaw.com>; Lydia Anderson-Dana <landersondana@stollberne.com>; Fishbein, Gregg M. <gmfishbein@locklaw.com>; Gibbs, Patrick <pgibbs@cooley.com>; Martin, Christopher L. <cmartin@cooley.com>; Lightdale, Sarah <slightdale@cooley.com>; Koch, Bryan <bkoch@cooley.com>; Munley, Caitlin B <cmunley@cooley.com>; wmcnab@winthrop.com; tcooke@winthrop.com; z/CTLSecMN <zCTLSecMN@cooley.com>

Subject: In re CenturyLink Sales Practices & Sec. Litig., No. 18-cv-296 (MJD/KMM)

[External]

Ryan,

Please see the attached letter regarding Plaintiffs' subpoena to Qualfon.

Best,
Keil

Keil M. Mueller
keil@stollberne.com
direct: (503) 972-7157
pronouns: he/him/his

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